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Jonathan I. Epstein,
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Established 1849 June 11, 2002

VIA TELECOPIER AND FEDERAL EXPRESS

John H. FitzSimons, Secretary and General Counsel **DYSON-KISSNER-MORAN CORPORATION** 565 Fifth Avenue, Fourth Floor New York, New York 10017

Request for Information from USEPA Bayonne Barrel & Drum Superfund Site

150-154 Raymond Boulevard, Newark, Essex County, New Jersey

Dear Mr. FitzSimons:

Re:

Please find attached for your review and action a Request for Information pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9601-9675 ("CERCLA"), issued by the United States Environmental Protection Agency, Region II ("USEPA"). The CERCLA Request for Information, dated May 2, 2002, was issued to Arrow Group Industries, Inc. ("Arrow") relating to the Bayonne Barrel & Drum Superfund Site located at 150-154 Raymond Boulevard in the City of Newark, Essex County, New Jersey.

Under the terms of the pertinent parts of the August 27, 1992 Asset Purchase Agreement among Arrow Acquisition, Inc., Arrow and the Dyson-Kissner-Moran Corporation ("DKM"), any liability arising out of the Bayonne Barrel & Drum site constitutes a pre-closing "Excluded Liability" which was not assumed "new Arrow." As you know, DKM has resolved previous matters involving "Excluded Liabilities" with "new Arrow," including the payment of de minimis settlement offers under the August 27, 1992 Asset Purchase Agreement involving the Frontier Chemical Superfund Site in Niagara Falls, New York and the Four County Landfill Site in DeLong, Indiana.

Arrow formally requests that DKM respond to the USEPA's May 2, 2002 Request for Information and, as required, follow up and resolve this matter with the USEPA pursuant to the August 27, 1992 Asset Purchase Agreement. For your information, "new Arrow" has conducted a preliminary review of its files and "new Arrow" has not been able to identify any information relevant to USEPA's Request for Information in its present files.

Please note that Sara Flanagan, Esq. of the USEPA's Office of Region Counsel, New Jersey Superfund Branch, has granted DKM an extension of time to respond to the Request for Information until on or before June 28, 2002.

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John H. FitzSimons, Secretary and General Counsel June 11, 2002 Page 2

Please do not hesitate to contact me if you have any questions on this matter.

Very truly yours,

Jøseph N. Schmidt, Jr.

JNS

Attachments

cc: Joseph Cosentino, OSC, USEPA (w/o Attach.)
Sarah Flanagan, Esq., USEPA (w/o Attach.)

Geroge C. Laski, Arrow Group Industries, Inc. (w/o Attach.) Adam Sigerson, Applied Resources Technology (w/o Attach.)